

## UNITED STATES DISTRICT COURT

for the  
Western District of Washington

In the Matter of the Search of  
(Briefly describe the property to be searched  
or identify the person by name and address)

Mobile telephone, (206) 200-7499 (TT-1),  
as described in Attachment A

Case No. MJ18-424

## APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

Mobile telephone, (206) 200-7499 (TT-1), as described in Attachment A

located in the Western District of Washington, there is now concealed (identify the person or describe the property to be seized):

The information and items set forth in Attachment B hereto.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

<i>Code Section</i>	<i>Offense Description</i>
18 USC 1028	Identity Theft, Manufacturing and trafficking in fraudulent identity documents
18 USC 1028A	Aggravated Identity Theft

The application is based on these facts:  
See affidavit which is attached hereto and incorporated herein by this reference.

- ☒ Continued on the attached sheet.
- ☒ Delayed notice of 90 days (give exact ending date if more than 30 days: 01/25/2019) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

*Applicant's signature*

Shawna McCann, Special Agent

*Printed name and title*

Sworn to before me pursuant to CrimRule 4.1.

Date: 09/12/2018

City and state: Seattle, Washington

*Judge's signature*

Brian A. Tsuchida, United States Magistrate Judge

*Printed name and title*

## **ATTACHMENT A**

This search warrant shall apply to:

a. **Target Telephone 1:** A mobile telephone assigned the number (206) 200-7499 and with no subscriber name listed. It is believed that this number is currently being utilized by Jacob E. Jones; as well as to (i) any instrument to which the listed target telephone number(s) was assigned within the last 30 days, and that now has been assigned a changed telephone number, (ii) any changed telephone number(s) assigned to an instrument now bearing the same ESN/IMSI/IMEI as the telephone numbers listed above, or that was bearing the same ESN/IMSI/IMEI as the telephone numbers listed above, at any point within the last 30 days, (iii) any changed ESN subsequently assigned to the same telephone numbers, or (iv) any additional changed telephone number(s) and/or ESN/IMSI/IMEI, whether the changes occur consecutively or simultaneously, listed to the same subscriber and wireless telephone account number as the telephone numbers listed above, within the period of disclosure authorized by the order.

**It is ordered that Cellco Partnership dba Verizon Wireless and its agents and employees must provide assistance in executing the search warrant to either the Federal Bureau of Investigation and/or its designees.**

**This warrant and attachment are sealed. Cellco Partnership dba Verizon Wireless and its agents and employees must not disclose the existence of this search warrant or the investigation to any person until the person whose object or property was searched has been notified by the government or until authorized to do so by the Court.**

## **ATTACHMENT B**

This search warrant shall apply to:

1. Historical call detail records with cell-site location data for the Target Telephone, including switch identification, activation data, signaling information, a listing of control channels and their corresponding cell sites, and engineering maps showing all pertinent cell site tower locations, sectors, and orientations, for a period of 60 days prior to the issuance of this Search Warrant.

I, SHAWNA MCCANN, a Special Agent with the Federal Bureau of Investigation, Seattle, Washington, having been duly sworn, state as follows:

1. I am employed as a Special Agent (SA) with the United States Federal Bureau of Investigation (FBI), and have been so employed since September 17, 2017. I am currently assigned to the Seattle Field Office where I am a member of the violent crime and gang squad and the Seattle Safe Streets Task Force.

2. I received five months of training at the FBI Academy in Quantico, Virginia on criminal investigations, including narcotics and fraud investigations. In that training I have learned how to recognize indicators involved with narcotics and fraud-related activity.

3. During my career, I have been involved in narcotics arrests and search warrants in drug, organized crime, and child pornography cases. I have also authored affidavits in support of federal warrant applications, participated in executing state and federal warrants, and have interviewed drug traffickers and informants with knowledge of drug trafficking. I have also served as a case agent on prior federal criminal investigations into Drug Trafficking Organizations (DTOs) and other criminal activity.

4. Because of this experience and training, I am familiar with common methods of investigating drug trafficking and trafficking in stolen and fraudulent goods, and have become familiar with the methods of operation of drug and fraudulent goods traffickers and manufacturers, including, but not limited to: their methods of producing and concealing the drugs or fraudulent goods; their methods of transferring and distributing the drugs or fraudulent goods, their use of cellular telephones; their use of

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1 numerical codes, code words, and counter surveillance; and other methods of avoiding  
2 detection of law enforcement. I am also familiar with the various methods of  
3 transferring, and laundering proceeds from illegal activity.

4 5. I have obtained the facts set forth in this affidavit through my personal  
5 participation in the investigation described below; from oral and written reports of other  
6 law enforcement officers participating in this and related investigations, and from  
7 records, documents and other evidence obtained during this investigation. Since this  
8 affidavit is being submitted for the limited purpose of obtaining a tracking warrant and a  
9 search warrant, I have not included every fact known concerning this investigation. I  
10 have set forth only the facts that I believe are essential to establish the necessary  
11 foundation for an order authorizing cell site and GPS data, both prospective (as requested  
12 in the tracking warrant) and historical (as requested in the search warrant).

13 **INTRODUCTION AND PURPOSE OF AFFIDAVIT**

14 6. This affidavit is submitted in support of Applications to obtain a tracking  
15 warrant and a search warrant for current (tracking warrant) and historical (search warrant)  
16 cell-site information, on the following cellular telephone:

17 a. **(206) 200-7499** (hereafter **Target Telephone 1** or "**TT1**"). Service  
18 to TT1 is provided by Celco Partnership dba Verizon Wireless. This is a cellular  
19 telephone account with no subscriber name listed. As described below, I believe this  
20 number is currently being utilized by Jacob E. Jones.

21 7. I am requesting a Tracking Warrant and a Search Warrant for TT1 in order  
22 to receive GPS tracking information to ascertain the phone's whereabouts at all times  
23 going forward (pursuant to the tracking warrant), and to receive historical cell tower  
24 tracking data in order to ascertain their past whereabouts (pursuant to the search warrant),  
25 which would assist the investigation by informing Agents about TT1's location during its  
26 use to promote illegal activities. As described below, Agents believe TT1 is currently  
27 utilized by Jacob E. Jones in furtherance of identity theft and manufacturing and  
28 trafficking fraudulent identity documents, in violation of 18 U.S.C. §§ 1028 and 1028A.

**SUMMARY OF PROBABLE CAUSE**

**A. Background – Controlled Buys from Jacob E. Jones.**

8. The investigation began in the Spring of 2018 and identified Jacob E. Jones (Jones) as manufacturing and trafficking fraudulent identity documents in Western Washington.

9. During the investigation, cooperating source(s) (hereafter identified as CS) have provided information on Jones.

10. In the Spring of 2018, investigators interviewed a CS<sup>1</sup> willing to provide information about Jones. The CS reported Jones told CS that Jones was manufacturing and selling fraudulent identity documents. The CS stated that Jones personally told CS that Jones could provide the CS with fraudulent identity documents and that Jones provided a sample of his fraudulent identity document work to CS.

11. Through follow up communications with the CS, investigators determined that utilizing undercover officer(s) (hereafter referred to as “UC”) would be more beneficial to the investigation. Investigators solicited the assistance of trained and experienced undercover officer(s) who agreed to assist in this case.

12. In the Spring of 2018, the CS contacted Jones to arrange a meeting with the UC for the purchase of fraudulent identity documents, including a Washington driver’s license and a Social Security card.

13. In June 2018, the UC met with Jones in Tukwila, WA. During discussions with the UC, Jones offered to sell two fraudulent identity “packages” to the UC for \$700

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<sup>1</sup>CS has worked as a paid informant for the FBI for over four years and has proven reliable in the past by providing information on individuals involved in illegal activity, including trafficking in stolen property and firearms and terrorist activities. CS has 16 felony convictions, including for Robbery, Burglary, and Possession of Stolen Property. CS has three gross misdemeanor non-traffic convictions, including for Theft in the Third Degree 3, and one misdemeanor conviction. The identity of CS is not being disclosed in this application. I believe that doing so, could place CS’s safety and security in jeopardy and compromise this and other ongoing investigations in which the CS is involved and is being utilized.



1 each. Jones advised the UC that Jones required a high-quality photograph of each person to  
2 create the fraudulent identity documents.

3 14. In June 2018, the UC communicated with Jones via cell phone and provided  
4 Jones with photographs of the two individuals for whom the UC wanted to purchase  
5 fraudulent identity “packages.”

6 15. In July 2018, investigators conducted two controlled purchases of  
7 fraudulent identity documents from Jones in Tukwila and Seattle, Washington, consisting  
8 of a set of Washington driver’s licenses, Social Security cards, and notes of details about  
9 the true individuals’ lives, including employment, family, and banking information. Via  
10 records checks, investigators were able to confirm that the identities and personal  
11 identifying information used on the fraudulent documents belonged to real individuals.

12 16. During the controlled purchases, investigators conducted surveillance and  
13 identified the vehicle operated by Jones for both purchases but did not observe any  
14 equipment used to manufacture the fraudulent identity documents in the vehicle operated  
15 by Jones.

16 17. Jones discontinued use of the phone number he was using to communicate  
17 with the UC in June and July 2018. The vehicle that investigators identified as being  
18 used by Jones during the controlled purchases was registered to ABC Transmission  
19 Service in Tacoma, Washington. Investigators conducted surveillance of the addresses  
20 listed for Jones in law enforcement databases and with the Washington Department of  
21 Licensing. Investigators have had limited success utilizing surveillance and law  
22 enforcement records to identify location(s) of residence, storage of equipment used to  
23 manufacture the fraudulent identity documents, and other possible stash locations.

24 **B. Probable Cause as to Target Telephone 1**

25 18. On or about August 14, 2018, Jones contacted the UC to inform the UC that  
26 Jones was using a new phone number and to inquire about a future meeting with the UC  
27 to sell additional fraudulent identity documents to the UC. The new phone number Jones  
28 used to communicate with the UC on or about August 14, 2018 was (206) 200-7499.

1 Investigators met with the UC and reviewed the UC's phone to verify the number and  
2 contact information of Jones. Investigators observed that TT1 contacted the UC via text  
3 message. The text messages from Jones to the UC indicated that Jones was ready to  
4 supply the UC with more fraudulent identity documents.

5 19. Investigators have attempted to locate Jones's residence, location(s) of  
6 manufacturing, and possible stash houses through checking historical known addresses  
7 for him and by conducting surveillance on known associates of Jones. However,  
8 investigators have been unable to locate these locations using those other methods.

9 **C. Prior Request for Pen Register, Trap and Trace, and Warrants**

10 20. On August 23, 2018, Magistrate Judge James P. Donohue signed an order  
11 authorizing a pen register, trap and trace device, and tracking and search warrants for  
12 TT1. The pen register and trap and trace was implemented as planned. However, the  
13 FBI raised concerns that the tracking warrant and search warrant, as authorized, were not  
14 sufficiently clear in prohibiting notice by Celco/Verizon to its customer, and those  
15 warrants were not executed.

16 **NEED FOR REQUESTED INFORMATION**

17 **A. Real-Time Tracking Data**

18 21. Based upon my training and experience, one way to identify Jones and any  
19 co-conspirators is to utilize cell phone geo-location tracking data on a known subject cell  
20 phone to identify potential manufacturing and/or distribution locations, storage sites  
21 meeting places, additional associates, and patterns of deliveries and transactions. That  
22 information is then used to gather evidence of the cell phone user's fraudulent identity  
23 document trafficking.

24 22. Obtaining this geo-location data on the Target Telephones is also critical to  
25 accurately identifying manufacturing and/or packaging locations, storage sites, and  
26 shipping locations, and other co-conspirators who meet with target of this investigation.  
27 The use of tracking warrant data will assist the affiant and surveillance team members in  
28



1 observing Jacob Jones and his associate(s) in a safe manner for a period of time while  
2 still developing investigative material.

3 **B. Historical Cell-Site Data**

4 23. For the same reasons described above relating to real-time tracking data,  
5 historical cell-site data for the past 60 days, or roughly to the point when the undercover  
6 was introduced to Jones, will help identify patterns in the use of TT1, which may help  
7 identify co-conspirators, locations of manufacture, storage, and/or distribution of  
8 fraudulent identity documents.

9 **B. Need for Delayed Notification**

10 24. Based upon my knowledge, training, and experience, it is my belief that the  
11 information contained in this affidavit, if prematurely disclosed to the public, could result  
12 in the target's flight from prosecution, destruction of and/or tampering with evidence,  
13 intimidation of potential witnesses, or otherwise seriously jeopardizes the ongoing  
14 investigation. Based on information provided by cooperating source(s) and other law  
15 enforcement personnel, I also believe that the investigation will ultimately lead us to  
16 other individuals involved in illegal activity, including theft, drug trafficking, and/or  
17 stolen property trafficking. Therefore, to avoid seriously jeopardizing this investigation,  
18 as well as to protect the safety of the confidential sources involved and their family  
19 members, and to avoid the risk of the suspects' potential flight from prosecution and  
20 destruction of evidence prior to indictment, I request that this affidavit be sealed and that  
21 notice required by Fed. R. Crim. P. 41(f) be delayed for up to ninety (90) days after  
22 expiration or removal of the tracker warrant, or any extension thereof, in accordance with  
23 Title 18, United States Code, Section 3103a(b).

24 **CONCLUSION**

25 25. Based on the foregoing, I respectfully submit there is probable cause to  
26 believe that TT1 is being used in furtherance of illegal activity, namely manufacturing  
27 and trafficking in fraudulent identity documents, and that the information sought herein  
28 will materially aid the investigation.

DATED this 12th day of September, 2018.

The above-named agent provided a sworn statement attesting to the truth of the contents of the foregoing affidavit on this 12th day of September, 2018.

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